

STEPHEN A. HILDEBRANDT
Chief Counsel



ORIGINAL
FILE

WESTINGHOUSE BROADCASTING COMPANY, INC.
400 NORTH CAPITOL STREET, N.W.
SUITE 550
WASHINGTON, D.C. 20001-1511
(202) 508-4470

June 1, 1992

RECEIVED

JUN - 1 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Filing of Westinghouse Broadcasting Company Inc.'s
Comments Regarding Redevelopment of Spectrum for
New Technologies**

Dear Ms. Searcy:

Enclosed for filing with the Commission is an original and nine (9) copies of Westinghouse Broadcasting Company, Inc.'s Comments regarding Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, ET Docket No. 92-9.

Should there be any questions in connection with these Comments, please feel free to contact me.

Respectfully submitted,

Stephen A. Hildebrandt
Chief Counsel

Enclosures

No. of copies rec'd
181A 8606

0 + 9

RECEIVED

JUN - 1 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In The Matter Of:

Redevelopment of Spectrum to)	
Encourage Innovation in the)	ET Docket No. 92-9
Use of New Telecommunications)	
Technologies)	

**COMMENTS OF
WESTINGHOUSE BROADCASTING COMPANY, INC.**

Westinghouse Broadcasting Company, Inc. ("Group W") hereby files its comments in the above captioned proceeding designed to establish new areas of the spectrum to be used for emerging telecommunications technologies. Group W is the owner of five (5) major market television stations ¹ and is particularly interested in this proceeding because the Commission considered, but ultimately did not propose, using frequencies in the 2 GHz band which is currently used for broadcast auxiliary services. These comments focus on the importance of preserving this band for important broadcast-related uses as the Commission proceeds to final decision in this Docket.

¹ KDKA-TV, Pittsburgh, Pennsylvania; KPIX, San Francisco, California; KYW-TV, Philadelphia, Pennsylvania; WBZ-TV, Boston, Massachusetts; WJZ-TV, Baltimore, Maryland.

The Notice of Proposed Rule Making Docket No. 92-90 ("Notice"), and the spectrum study upon which it is based,² evidence a careful and measured approach to solving the policy dilemma of need for new frequency to support emerging technologies. The factors identified by the Commission in making these spectrum decisions -- such as cost of equipment, amount of spectrum, and feasibility of relocation³-- provide a framework for analysis which will serve both existing and new users. **In particular, Group W believes that the Commission has appropriately applied these criteria in its decision that it is not practicable at this time to relocate the broadcast auxiliary services that use spectrum in the 1.85-2.20 GHz range⁴.**

The Commission found that the 1.99-2.11 GHz band, which is currently used for broadcast auxiliary services, is heavily used for ENG services. This finding is absolutely true and is supported by the experience of Group W at its five television stations. Use of this 2 GHz band for electronic news gathering is essential to the operation of these stations. It allows them to transmit live reports on breaking news stories from anywhere in the stations' service area. Without access to these reliable microwave frequencies, stations would lose the ability to quickly bring important news stories live to the public eye, a service which our local viewers have come to rely upon.

The primary use of these frequencies by broadcasters is for mobile and portable electronic news gathering and not fixed point-to-point links. Over the last 10 years, many broadcasters have voluntarily moved fixed point-to-point links to higher frequency bands in order to free up the 2 GHz band for

² "Creating New Technology Bands for Emerging Telecommunications Technology," FCC/OET TS 92-1 (January, 1992).

³ Notice at paragraph 10

⁴ Notice at paragraph 18

mobile news gathering. This illustrates that, if anything, there is a shortage of frequencies available for such news gathering, particularly during peak reporting periods and important news events. In fact, Group W suggests that the excellent OET spectrum analysis report could be expanded to include data on peak usage of frequencies as well as average use.

There are no other available frequencies for broadcasters to move to in order to provide this important news gathering service. Also, cable or fiber are not good alternatives for broadcasters. For example, during disasters, microwave links using broadcast auxiliary frequencies are more reliable than fiber and coaxial cables. Also, the need to be mobile, and go where the news is happening, makes the availability of the 2GHz band essential for fulfilling our license obligations to serve the public in our local communities.

The Commission has also correctly stated that the feasibility of relocation is an important factor. The existing licensees must be able to relocate with a minimum of cost and disruption of service to consumers. There would be serious cost and disruption if broadcasters were required to move from the 2GHz band. Group W's five television stations currently have 2GHz equipment valued at \$2,706,000. It would cost an average of \$550,000 per station to change out the necessary equipment if a move from 2 GHz were forced. This is a serious economic impact at a time that the broadcasting industry is suffering from revenue losses due to the recession and increased competition.⁵ It also would come at a time that the Commission is asking broadcasters to spend millions of dollars to upgrade television broadcasting in the United States to High Definition Television.


⁵See generally, Office of Plans and Policy Working Paper series 26: Broadcast Television in a Multichannel Marketplace, June 1991

It is clear that there is serious congestion in the use of broadcast auxiliary frequencies in the major markets. Also, it is clear that alternative technologies are not suited for broadcasters' mobile communication needs. In fact, the use of available spectrum for portable, mobile operations is in line with the Commission's current spectrum utilization policies.⁶ **Continuing to reserve the 2GHz band for the important ENG news gathering functions of television stations is critical to the continued ability of these stations to serve the public.**

In sum, Group W applauds the Commission's careful analysis and decision in this docket. The spectrum needs of broadcasters have been accurately assessed and Group W strongly urges the Commission to continue to protect the 2GHz band for broadcast use as it finalizes its decision in this Docket.

Respectfully submitted,

WESTINGHOUSE BROADCASTING
COMPANY, INC.



Stephen A. Hildebrandt, Esquire
Chief Counsel
Westinghouse Broadcasting Company, Inc.
400 North Capitol Street, N.W.
Washington, D.C. 20001-1511
(202) 508-4470

⁶ See Notice at footnote 17.